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July 15, 2025

BY ECF

Hon. Sarah L. Cave
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Kaplan, et al. v. JPMorgan Chase Bank, N.A., et al.*, No. 1:25-cv-01900-LJL—
Joint Request for Extension of Time to Exchange Settlement Demand and Counter

Dear Judge Cave:

We write on behalf of defendant JPMorgan Chase Bank, N.A. (“Chase”), who we represent, and Plaintiffs to jointly request an extension of time for Plaintiffs to send a settlement demand to Chase and for Chase to respond to such demand prior to the upcoming settlement conference on July 29, 2025.

Pursuant to the Settlement Conference Scheduling Order, Plaintiffs must make a settlement demand to Chase by July 15, 2025, Chase must respond to that demand by July 22, 2025, and the parties must submit settlement statements to the Court by July 23, 2025. *See* Doc. No. 23. On July 11, 2025, Chase sent certain information to Plaintiffs to facilitate discussions in advance of the conference. On July 14, 2025, Plaintiffs informed Chase that its counsel is on trial this week,¹ and, so that he could review the information Chase sent, requested an extension of time to send a settlement demand through and including July 21, 2025. Chase has consented to this extension, so long as it is permitted a commensurate extension of time to respond to the settlement demand, *i.e.*, to July 28, 2025. The parties jointly and respectfully request that Plaintiffs be permitted to send a settlement demand to Chase by **July 21, 2025** and for Chase to respond to such settlement demand by **July 28, 2025**.

In addition, because the parties’ settlement statements are due to be sent to the Court on July 23, 2025—before the new requested July 28, 2025 deadline to respond to Plaintiffs’ demand—and given that Your Honor’s Standing Order requires settlement statements to reference “prior offers or demands,” the parties jointly request that Chase be permitted to inform the Court of its response to Plaintiffs’ settlement demand in-person at the conference.

We thank the Court for its attention to this matter and look forward to appearing before Your Honor at the settlement conference on July 29.

¹ The trial is in the action *Schoenberger v Martin J. Jennings Jr.*, MER-L-000592-23 (NJ Superior Ct.).

The parties' request at ECF No. 27 is **GRANTED**. Plaintiff shall send a settlement demand to Chase by **July 21, 2025**, Chase shall respond to such settlement demand by **July 28, 2025**, and Chase shall inform the Court of its response in-person at the July 29, 2025 settlement conference.

The Clerk of Court is respectfully directed to close ECF No. 27.

SO ORDERED. July 16, 2025

SARAH L. CAVE
United States Magistrate Judge

July 15, 2025

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Respectfully submitted,

/s/ Sylvia E. Simson

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CC (by ECF): All counsel of record